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Board of Vocational Nursing  
and Psychiatric Technicians

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**BEFORE THE DIRECTOR  
DEPARTMENT OF CONSUMER AFFAIRS  
BUREAU OF VOCATIONAL NURSING AND PSYCHIATRIC TECHNICIANS  
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

Case No. VN-2005-1275

**PERRY CAMERON**  
**aka PERRY JORDAN CAMERON**  
26012 Marquette Pkwy., #H-118  
Mission Viejo, CA 92692

**ACCUSATION**

Vocational Nurse License No. VN 207737

Respondent.

Teresa Bello-Jones, J.D., M.S.N., R.N. ("Complainant") alleges:

**PARTIES**

1. Complainant brings this Accusation solely in her official capacity as the Executive Officer of the Bureau of Vocational Nursing and Psychiatric Technicians ("Bureau"), Department of Consumer Affairs.

2. On or about January 20, 2004, the Bureau issued Vocational Nursing License Number VN 207737 to Perry Cameron, also known as Perry Jordan Cameron ("Respondent"). The license will expire on September 30, 2009, unless renewed.

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## STATUTORY PROVISIONS

3. Business and Professions Code ("Code") section 2875 provides, in pertinent part, that the Board may discipline the holder of a vocational nurse license for any reason provided in Article 3 (commencing with section 2875) of the Vocational Nursing Practice Act.

4. Code section 118(b) provides, in pertinent part, that the expiration of a license shall not deprive the Board jurisdiction to proceed with a disciplinary action during the period within which the license may be renewed, restored, reissued or reinstated. Under Code section 2892.1, the Board may renew an expired license at any time within four years after the expiration.

5. Code section 477 states:

"As used in this division:

"(a) 'Board' includes 'bureau,' 'commission,' 'committee,' 'department,' 'division,' 'examining committee,' 'program,' and 'agency.'"

6. Code section 101.1(b)(1) states:

"In the event that any board, as defined in Section 477, becomes inoperative or is repealed in accordance with the act that added this section, or by subsequent acts, the Department of Consumer Affairs shall succeed to and is vested with all the duties, powers, purposes, responsibilities and jurisdiction not otherwise repealed or made inoperative of that board and its executive officer."

7. Code section 2878 states, in pertinent part:

"The Board may suspend or revoke a license issued under this chapter [the Vocational Nursing Practice Act (Bus. & Prof. Code, § 2840, et seq.)) for the following:

"(a) Unprofessional conduct.

"....

"(f) Conviction of a crime substantially related to the qualifications, functions, and duties of a licensed vocational nurse, in which event the record of the conviction shall be conclusive evidence of the conviction.

1 "....  
2 "(j) The commission of any act involving dishonesty, when that action is related  
3 to the duties and functions of the licensee."

4 8. Code section 2878.5 states, in pertinent part:

5 "In addition to other acts constituting unprofessional conduct within the meaning  
6 of this chapter, it is unprofessional conduct for a person licensed under this chapter to do any of  
7 the following:

8 "(a) Obtain or possess in violation of law, or prescribe, or except as directed by a  
9 licensed physician and surgeon, dentist or podiatrist administer to himself or herself or furnish or  
10 administer to another, any controlled substance as defined in Division 10 of the Health and  
11 Safety Code, or any dangerous drug as defined in Section 4022."

#### 12 COST RECOVERY

13 9. Code section 125.3 provides, in pertinent part, that the Board may request  
14 the administrative law judge to direct a licensee found to have committed a violation or  
15 violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation  
16 and enforcement of the case.

#### 17 DRUGS

18 10. "Heroin" is a Schedule I controlled substance as designated by Health and  
19 Safety Code section 11054(c)(11), and is classified as a dangerous drug pursuant to Business and  
20 Professions Code section 4022.

21 11. "Cocaine" is a Schedule II controlled substance as designated by Health  
22 and Safety Code section 11055(b)(6), and is classified as a dangerous drug pursuant to Business  
23 and Professions Code section 4022.

#### 24 FIRST CAUSE FOR DISCIPLINE

##### 25 (Conviction of a Crime)

26 12. Respondent is subject to discipline under Code section 2878(f), in that he  
27 was convicted of the following crimes that are substantially related to the qualifications,  
28 functions or duties of a licensed vocational nurse:

1           a.       On or about January 12, 2007, in the case of *People v. Perry Jordan*  
2 *Cameron, also known as Perry Cameron, also known as Perry J. Cameron*, (Super. Ct. Orange  
3 County, 2006, Case No. 06SM05534), Respondent was convicted by the Court on his plea of  
4 guilty of violating Penal Code section 422 (criminal threats). The circumstances of the crime  
5 were that on or about December 25, 2006, Respondent willfully and unlawfully threatened  
6 N.P.C. to commit a crime which would result in death and great bodily injury to N.P.C. with the  
7 specified intent that the statement be taken as a threat, and the statement was so unequivocal,  
8 unconditional, immediate, and specified as to convey to the person threatened a gravity of  
9 purpose and an immediate prospect of execution of the threat, causing N.P.C. to reasonably be in  
10 sustained fear for her safety and the safety of her immediate family.

11           b.       On or about January 22, 2007, in the case of *People v. Perry Jordan*  
12 *Cameron, also known as Perry Cameron*, (Super. Ct. Orange County, 2005, Case No.  
13 05CM07273), Respondent was convicted by the Court on his plea of guilty of violating Health  
14 and Safety Code section 11364 (possession of controlled substance paraphernalia), and Health  
15 and Safety Code section 11532(a) (loitering in a public place to buy and sell controlled  
16 substances). The circumstances of the crime were that on or about July 1, 2005, Respondent  
17 unlawfully possessed an opium pipe or device, contrivance, instrument, or paraphernalia used for  
18 unlawfully injecting or smoking a controlled substance. In addition, Respondent unlawfully  
19 loitered in a public place in a manner and under circumstances manifesting the purpose and with  
20 the intent to commit an offense specified in Health and Safety Code sections 11350-11392 and  
21 11400-11401, in that Respondent attempted to purchase Cocaine.

22           c.       On or about June 25, 2007, in the case of *People v. Perry Cameron, also*  
23 *known as Perry Jordan Cameron, also known as Perry J. Cameron*, (Super. Ct. Orange County,  
24 2007, Case No. 07SM01313), Respondent was convicted by the Court on his plea of guilty of  
25 violating Health and Safety Code section 11364 (possession of controlled substance  
26 paraphernalia). The circumstances of the crime were that on or about March 4, 2007,  
27 Respondent did unlawfully possess an opium pipe or a device, contrivance, instrument, or  
28 paraphernalia used for unlawfully injecting or smoking methamphetamine, a controlled

1 substance. Respondent was sentenced to three (3) years probation. He was ordered to use no  
2 unauthorized drugs, narcotics or controlled substances; submit to drug or narcotic testing;  
3 cooperate in a plan for psychiatric, psychological, alcohol and/or drug treatment or counseling;  
4 complete drug treatment pursuant to Penal Code section 1210 and abide by drug treatment plea  
5 agreement. On or about September 25, 2007, the court vacated the order requiring completion of  
6 drug treatment pursuant to Penal Code 1210, and ordered Respondent to serve twenty-four (24)  
7 days in custody. Respondent was given credit for time served, and his probation was terminated.

8 d. On or about July 18, 2008, in the case of *People v. Perry Cameron, also*  
9 *known as Perry Jordan Cameron, Perry J. Cameron, Perry Jordan Camero* (Super. Ct. Orange  
10 County, 2008, Case No. 08WM05745), Respondent was convicted by a jury of violating Penal  
11 Code section 417(a)(1) (brandishing a deadly weapon). The circumstances of the crime were that  
12 on or about June 18, 2008, Respondent unlawfully, and not in self-defense, drew and exhibited a  
13 knife, a deadly weapon, in a rude, angry, and threatening manner in the presence of I.B., and did  
14 unlawfully use a knife, a deadly weapon, in a fight and quarrel. On or about July 31, 2008,  
15 Respondent was sentenced to thirty (30) days in custody and one (1) year of probation.

## 16 SECOND CAUSE FOR DISCIPLINE

### 17 **(Possessed and Self-Administered Controlled Substances)**

18 13. Respondent is subject to discipline under Code section 2878(a), on the  
19 grounds of unprofessional conduct, as defined by Code section 2878.5(a), in that in or about  
20 March 2007, Respondent possessed and administered Cocaine and Heroin, controlled substances,  
21 without a prescription in violation of Code section 4060, as set forth in paragraph 12 above,  
22 which is incorporated herein by this reference.

## 23 THIRD CAUSE FOR DISCIPLINE

### 24 **(Dishonest Acts)**

25 14. Respondent is subject to discipline under Code section 2878(j), in that  
26 Respondent committed acts of dishonesty by failing to disclose the convictions, set forth above in  
27 paragraph 12, subdivisions (a) and (c), on his Application for Renewal of License dated  
28 October 4, 2007.

1 **PRAYER**

2 **WHEREFORE**, Complainant requests that a hearing be held on the matters  
3 herein alleged, and that following the hearing, the Director of Consumer Affairs issue a decision:

- 4 1. Revoking or suspending Vocational Nurse License Number VN 207737,  
5 issued to Perry Cameron, also known as Perry Jordan Cameron;  
6 2. Ordering Perry Cameron, also known as Perry Jordan Cameron to pay the  
7 Bureau of Vocational Nursing and Psychiatric Technicians the reasonable costs of the  
8 investigation and enforcement of this case, pursuant to Code section 125.3; and,  
9 3. Taking such other and further action as deemed necessary and proper.

10 **DATED:** December 16, 2008

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12 TERESA BELLO-JONES, J.D., M.S.N., R.N.  
13 Executive Officer  
14 Bureau of Vocational Nursing and Psychiatric Technicians  
15 Department of Consumer Affairs  
16 State of California  
17 Complainant

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